



Your business
is our business.

DOCKET FILE COPY ORIGINAL

REDACTED - FOR PUBLIC INSPECTION

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June 18, 2014

Accepted/Files

JUN 18 2014

Federal Communications Commission
Office of the Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Shidler Telephone Company
Study Area Code 432023**

Dear Ms. Dortch:

On behalf of Shidler Telephone Company ("Shidler"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Shidler seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0 + 3
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

<010> Study Area Code 432023
<015> Study Area Name SHIDLER TEL CO
<020> Program Year 2015
<030> Contact Name: Person USAC should contact
with questions about this data Lisa Patton
<035> Contact Telephone Number:
Number of the person identified in data line <030> 9187932211 ext.
<039> Contact Email Address:
Email of the person identified in data line <030> lisa@stinternet.net

Accepted/Files
JUN 13 2014
Federal Communications Commission
Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div>(attach descriptive document)</div>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div>(attach descriptive document)</div>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 432023ok510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 432023ok610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000> (check to indicate certification)
<2005> (complete attached worksheet)

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> (check to indicate certification)
<3005> (complete attached worksheet)

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5			
<111>	year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

432023ok112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="checkbox"/>
<114>	Report how much universal service (USF) support was received	<input type="checkbox"/>
<115>	How (USF) was used to improve service quality	<input type="checkbox"/>
<116>	How (USF) was used to improve service coverage	<input type="checkbox"/>
<117>	How (USF) was used to improve service capacity	<input type="checkbox"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="checkbox"/>

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

[illegible]

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	<u>Lisa Patton</u>
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	<u>lisa@stinternet.net</u>

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2014

[illegible]

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[710] Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 432023

<015>	Study Area Name	SHIDLER TEL CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
-------	---	-------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
-------	---	---------------------

[illegible]

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(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

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(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<910> Tribal Land(s) on which ETC Serves

Osage Nation

<920> Tribal Government Engagement Obligation

432023OK920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

432023ok1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)) ☐
- <2011> 3rd Year Certification (47 CFR § 54.313(b)(2)) ☐

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Certification ☐
- <2013> 2014 Frozen Support Certification ☐
- <2014> 2015 Frozen Support Certification ☐
- <2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification ☐
- <2018> 5th year Broadband Service Certification ☐
- <2019> Interim Progress Certification ☐
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No) ☒ Yes ☒ No

(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

432023ok3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☒ Yes ☒ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035> Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035> Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Karen Gunkel</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Karen Gunkel
Name of Reporting Carrier:	SHIDLER TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/16/2014
Printed name of Authorized Officer:	Lisa Patton
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	9187932211 ext.
Study Area Code of Reporting Carrier:	432023 Filing Due Date for this form: 06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	SHIDLER TEL CO
Name of Authorized Agent or Employee of Agent:	Karen Gunkel
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/16/2014
Printed name of Authorized Agent or Employee of Agent:	Karen Gunkel
Title or position of Authorized Agent or Employee of Agent:	Staff Consultant - Revenue Requirements
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.227
Study Area Code of Reporting Carrier:	432023 Filing Due Date for this form: 06/30/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED - FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

SHIDLER TELEPHONE COMPANY (SAC 432023)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Shidler Telephone Company

Study Area Code 432023

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband Service

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Shidler Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Shidler Telephone Company

Study Area Code 432023

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Shidler Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.

REDACTED - FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 432023

<015>	Study Area Name	SHIDLER TEL CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
-------	---	-------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
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[illegible]

REDACTED - FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

Shidler Telephone Company

Study Area Code 432023

Response to Line 920- Tribal Engagement Obligation

Shidler Telephone Company ("Company") serves the Osage Nation located in northern Oklahoma. The Company reached out to the Osage Nation in 2013 in an attempt to engage in discussion of the Osage Nation's needs assessment and deployment planning for the communications needs of Tribal members and the Tribal government institution per the requirements of 47 C.F.R. §54.313(a)(9). The Osage Nation responded at the time that they were not prepared to discuss communications issues and would contact the Company at such time as they were ready to engage in those discussions. The following pages provide support for the attempt at communication made by the Company.

The Company makes best efforts to bring advanced telecommunications services and broadband services to all individuals within its service territory, including all Tribal members. The Company looks forward to further contact in 2014 to determine how the Company's service plans can be coordinated with the Osage Nation's special needs and projects planned either in the area or nearby that would affect service.

SHIDLER TELEPHONE COMPANY

PO Box 25

120 Broadway

Shidler, OK 74652

Telephone: (918) 793-2211 Fax: (918) 793-7211

January 31, 2013

Gayle Deese
Operations Manager
Osage Nation I.T.
627 Grandview Ave.
Pawhuska, OK 74056

Dear Gayle,

I am sending you (via email) the FCC Form 555 report for Shidler Telephone Company. This report is being provided pursuant to the FCC's Order issued in WC Docket No. 11-42 released February 6, 2012.

If you have any questions, please don't hesitate to contact me.

Thank you.

Sincerely,



Lisa Patton
Vice President